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1 should we Maillose the chicken or not, but I don't think
2 so. It remains. It is oil browned. That is a fact. It's
3 an oil-browned product.

4 Q It would be a heck of a time to find out now,
5 wouldn't it?

6 A Correct. That's why I was saying I would think
7 that question would have been asked by this point.

8 Q Do you consider the chicken products a
9 whole-muscle meat product?

10 A The Healthy Choice -- let me stop and think for a
11 second. Not all of the chicken products are considered to
12 be whole-muscle, because it's more of a processing. And
13 it's a couple of breasts emulsified together. But the
14 Healthy Choice -- the Healthy Choice, I believe, might be
15 whole-muscle.

16 Q Ma'am, you have in front of you what I'll mark as
17 Number 13, if you will hand me your copy. There you are.
18 As I reviewed these -- these were handed to me this
19 morning.

20 MR. TOMLINSON: Let's use the document numbers.

21 MR. CASTRO: Yeah. I'm going to.

22 Q (By Mr. Castro) 7875 through 7895, that was
23 handed to me an hour or two ago. And I appreciate Bob for
24 running that down. As I reviewed it, it appears to be a
25 set of documents that come from the same file. And because

1 of that, is this from your file?

2 A Yes, it is.

3 Q And when did you provide this to your counsel in
4 California? Do you know?

5 A It would have been before the February deposition.
6 I recall specifically Document 7876, we specifically -- you
7 asked me a question about this particular document in the
8 February deposition, so these were provided earlier, to my
9 knowledge, this whole grouping.

10 Q But did they have your handwritten -- I'm going to
11 ask you in a minute to identify if that's your handwriting?

12 A Yes.

13 Q But they didn't have your handwritten notes on
14 them, the ones -- if I showed you any documents back then,
15 would they have had your handwriting on those documents, if
16 you recall?

17 A If -- I haven't written on them subsequently, so
18 whatever was provided would have my handwriting on it.

19 Q All right. Have you had an opportunity to look at
20 that group of documents?

21 A Yes, I have.

22 Q Could you generally describe what these documents
23 represent?

24 A It's a series of documents that document the flow
25 of activity that happened during the course of the project,

1 starting with around December of 1997. As the project
2 person, as the project leader, I was a good note-taker and
3 I summarized meetings and would communicate with the group
4 as to what was going on related to the project.

5 So these are pretty much all in chronological
6 order. Some of the documents I did not prepare myself, but
7 perhaps they came up in one of our project team meetings.
8 So it appears that they're from the time frame December
9 1997, all the way through May of 1998.

10 Q Thank you. Ms. Burns, some of the documents are
11 not dated, so I want you to try to help me understand if
12 they're in the proper chronological order. All right. The
13 first document is 07875. And it's dated December 3rd,
14 1997. Do you see that?

15 A Yes.

16 Q Have you had a chance -- and if you have not, I'll
17 ask you to -- to review and see if these documents are in a
18 -- are in chronological order?

19 A I had a chance to do that, and I believe they are.

20 Q Okay. Thank you. This next document, 07876,
21 doesn't have a date. Does this document go with the first
22 -- with the December 3 memo?

23 A This document, I did not prepare.

24 Q Who prepared that document?

25 A I believe this was prepared by Prem Singh and/or

1 Stan Gershenson. And it goes with 7876, '77, '78, and '79,
2 and '80 all were together, I believe. And at one of the
3 meetings -- and I wouldn't recall at which exact meeting,
4 if it was the December 2nd meeting, but likely that -- it
5 likely could have been that meeting, that we reviewed
6 product at that meeting and then we talked about the
7 potential processes in order to brown the product.

8 And this is a document that someone, you know,
9 brought to that meeting, whether it was Stan or Prem, you
10 know, to help us make some decisions.

11 Q Do you know where you received the Maillose
12 samples that you reviewed that had this appealing
13 appearance similar to that of a Thanksgiving roasted
14 turkey? It's on the first page, 7875.

15 MR. TOMLINSON: Second.

16 MR. CASTRO: The second dot.

17 THE WITNESS: I see.

18 Q (By Mr. Castro) Do you know where those Maillose
19 samples were produced?

20 A At our product cutting, that would have been --
21 there would have been product with the Maillose process.
22 In that memo, I did not specifically say which specific
23 products, where they came from, so I don't know for sure if
24 it came from one supplier versus two suppliers versus
25 three. That, I don't recall.

1 Q Would it have come from, though, a third-party
2 vendor or supplier?

3 A It could have, but it also could have been done in
4 our pilot plant using the equipment of a third-party
5 supplier.

6 Q Fair enough.

7 At that time, Armour Swift-Eckrich didn't own any
8 equipment whereby they could produce this Maillose sample,
9 did they?

10 A To the best of my knowledge, no. We were looking
11 at outside people. For one -- as an option for browning,
12 you know, we could brown it in other ways internally --

13 Q Batch, you could --

14 A -- via the existing oil-browning process.

15 Q You could run it through a batch house; correct?

16 A I believe so.

17 Q At that time? And was the oil browning the same
18 as the batch house browning or a little bit different?

19 A I think it's a little bit different. It's --

20 Q Any other way -- I'm sorry.

21 A Because you actually dip the product in oil to
22 brown it, so I'm not sure if that -- that can be done in a
23 batch way or maybe even a continuous way. I'm not sure.

24 Q Okay. The second page, 7876, it -- under the
25 second dot, it has, "Approved labels. Caramel applied,

1 caramel color." Do you see that?

2 A Uh-huh.

3 Q Were -- were labels changed to reflect those two
4 characteristics?

5 A I believe there was a requirement in the labeling
6 law that when caramel is applied, you have to say with
7 caramel. If I could refer to our -- the sales materials,
8 again, we can actually see labels. But basically, there's
9 a -- you have to get that approved through the USDA. And
10 when you use caramels, when you brown it through the
11 Maillose method or with a caramel coloring of some kind,
12 you have to actually say caramel added or something like
13 that on the label.

14 Q Is Maillose a caramel coloring?

15 A That's my understanding, yes, that it fits into
16 that definition.

17 Q How did you obtain that understanding?

18 A Just through, you know, as -- as a matter of
19 course. Having to change the label, you know, we would --
20 I would obtain that through working with our inside people
21 who work with the USDA and get labels executed and
22 approved.

23 Q People such as Prem Singh?

24 A No. It would be -- it would be a different group
25 that's within the R&D group but that handle labels only.

1 It's a documentation group.

2 Q I see.

3 Not Syed Hussain or Prem Singh?

4 A Correct.

5 Q Not Chris Salm?

6 A I'm sure that those people consult -- when process
7 questions come up to play, if the USDA has a question about
8 how something's produced and how it's to be labeled, those
9 people may be consulted, but they're not the people that
10 actual handle obtaining the labels.

11 Q Oh, the third page, 7877, is that your handwriting
12 on that page?

13 A Yes.

14 Q Let me see if I -- is it -- was it your testimony
15 earlier that 7875 -- and I apologize for being repetitive,
16 I'm a little slow today. 7875 through 7880 were part of
17 one packet; right?

18 A I believe so. Yeah.

19 Q Okay. And you -- I see you wrote here, "Applied
20 for patent this week" -- can you read that for me?

21 A Yes. "Applied for patent this week. Will submit
22 final copy. Lock in range of color light to dark."

23 I believe where that came from would be, as we
24 were -- someone, whoever -- I think it was Prem. It was
25 Prem and Stan who prepared this document. As they were

1 taking the group through it, I would have jotted notes as
2 to the status of the activities in their area. And I would
3 have said, okay, they applied for the patent. Those are
4 simply notes taken during the meeting.

5 Q So you think that information would have come
6 through Stan Gershenson or Prem Singh?

7 A Correct.

8 Q You said they prepared this document. Which --
9 what do you mean? Which document did they prepare?

10 A The group that we talked about, 7876 through 7880.

11 Q Oh, okay. This 7880, they prepared that document?
12 You said that and --

13 A Yes.

14 Q Do you understand what it means, this oil browning
15 versus nonoil browning? Do you understand what it
16 represents?

17 A Yes. It outlines the capital cost comparing the
18 two options.

19 Q And when they say nonoil browning, does that mean
20 the Maillose-browning process?

21 A I think they just mean not oil browning at all,
22 not browning at all. I think it's just compared to white
23 as the baseline.

24 Q Oh, okay.

25 A So...

1 Q White would be considered oven baked?

2 A Correct. Just oven roasted, but not browned in
3 any way, shape, or form.

4 Q Okay.

5 A So because we were going from white to some kind
6 of browning, whether you oil brown it or -- maybe this -- I
7 don't know if this is Maillose. If this column to the
8 right -- I understand oil browning. Nonoil browning, I
9 don't know if that's referring to the Maillose cost, that
10 you brown it in some other way, non -- you know, versus oil
11 browning. So I think that's what it means. So there's an
12 oil-browning column, okay.

13 Q Okay.

14 A If you oil brown it. If you brown it in some
15 other way, but nonoil-based --

16 Q Like the Maillose process, it could be considered
17 nonoil browning?

18 A Yes.

19 Q All right. Now --

20 A So in looking at that, it would -- based on that,
21 that the capital cost is a little bit higher, the delivery
22 time frame is about the same, and the incremental cost to
23 actually make that product oil browned versus a Maillose or
24 a, you know, nonoil-browning process, it's -- actually
25 appears to be a lower cost.

1 Q About a third of the price, third of the cost;
2 right?

3 A That's correct.

4 Q Is that your understanding of in actuality what
5 occurred?

6 A I believe I've testified to this earlier, is that
7 I believe there was a 5 cent number that was tossed around
8 a bit that it was going to cost us about 5 cents more to
9 Maillose versus it being white. And I don't know, and Tim
10 -- maybe Tim got into this a little bit with the product
11 cost information. I don't know what our true incremental
12 cost ended up being.

13 Q Yeah. You said just -- you mean comparing it to
14 white product?

15 A Right.

16 Q What about comparing an oil browning versus a
17 Maillose browning?

18 A The only information that I would have would be
19 this on this piece of paper.

20 Q All right.

21 A I was not involved in the detail of the cost
22 analysis. That would come from Prem Singh or Stan
23 Gershenson.

24 Q 7877, these are just bullet points. This is
25 something they prepared?

1 A Uh-huh. Yes.

2 Q Hold on. I'm out of order already. I'm sorry.
3 That should be at the beginning. All right. I'm done with
4 that.

5 Now, the next document is a December 12th, '97
6 memo from you and -- is that -- does that mean it's from
7 you and Stan Gershenson?

8 A That's correct.

9 Q Okay. Did you prepare that document or did
10 Mr. Gershenson?

11 A I actually physically typed it and prepared it
12 with input from Stan in the areas where he was responsible,
13 the more technical areas.

14 Q That's Bates-stamp No. 7881; correct?

15 A Yes.

16 Q Down on -- it says, "Issue: Investigate Maillose
17 alternative to browning." Do you know where product was
18 being tested at that time, that is December 12th of 1997?

19 A Which vendor was -- which vendor's products were
20 being tested at that point? No, I don't know.

21 Q And do you know where the tests occurred?

22 A No. I was not involved at that level.

23 Q What about this laser option of browning?
24 Investigate laser option? Do you know which vendors were
25 responsible for running those types of tests?

1 A It was a -- I don't know specifically which
2 vendors. It was a subject matter that was brought up in
3 our team meeting. And it was one of the options that was
4 being looked at by the R&D group. Apparent -- what I
5 recall is that that time line was going to be quite long.
6 It was -- it's more of an innovative methodology to get
7 browning done. And I don't believe there were vendors that
8 were, you know, in a position to deliver that type of thing
9 at any reasonable time frame.

10 Q The next document, January 12th, '98, 7882 to I
11 think 7884; is that correct? Is that one document?

12 A Yes, it is.

13 Q That's a memo to you from -- I'm not sure from
14 whom. Oh, Stan Gershenson on the third page. I'm unclear
15 here. On the next page, it says Number 3, alternative oil
16 brown color. I'm not -- what does that -- what is the
17 nature --

18 MR. TOMLINSON: Why don't you let her read that.

19 THE WITNESS: Okay.

20 MR. CASTRO: Okay.

21 THE WITNESS: The oil-browned product samples that
22 we were looking at as we were exploring color tended to be
23 really dark, because our existing process turned it --
24 turned out a darker appearance. And in this particular
25 meeting, Deb Billow, who was my manager at the time,

1 suggested that perhaps we could do a better job with the
2 oil browning and not make it so dark and just offer that up
3 as another option to look at.

4 And I don't recall that we were able to achieve --
5 you know, we weren't able to achieve the right color,
6 quote-unquote. It was always pretty dark. The oil-browned
7 products tended to be darker and we wanted it a little bit
8 lighter.

9 Q (By Mr. Castro) Who is Jim Costelloe?

10 A Jim Costelloe works in the pilot plant.

11 Q Where is the pilot plant located?

12 A The pilot plant is located within the R&D facility
13 at 3131 Wood Creek Drive in Downers Grove. It's the
14 facility right in back of the corporate office of Armour
15 Swift-Eckrich.

16 Q Well, if you look at Number 4, it says that "Jim
17 Costelloe's first priority has been to develop a consistent
18 golden brown color. Now that it appears he has the process
19 perfected, he will put up product for shelf life purposes."

20 Do you know which vendors he was using in order to
21 obtain that product which had a consistent golden brown
22 color?

23 MR. TOMLINSON: Object to the form of the
24 question.

25 THE WITNESS: No, I don't.

1 Q (By Mr. Castro) Do you know whether he was using
2 any outside vendors to produce that consistent golden brown
3 color product?

4 A I just know, just as it states here, that he was
5 conducting tests in the pilot plant.

6 Q Did you have to consider any rebates as part of
7 the market launch of these new products?

8 A Please explain what you mean by "rebate."

9 Q I'm not sure. It's in the next document. January
10 29th, '98 memo. 7885 and I think 7886 go together; is that
11 correct? Do those two documents, pages go together?

12 A Yes, they do.

13 Q And that's a memo from you; correct?

14 A That's correct.

15 Q And the next -- the second page of that has, see
16 at the top, Butterball entry strategy. And it says,
17 "Consider rebates as part of a sell-in strategy to get
18 trade to take on new SKUs." That's why I asked you if you
19 needed to --

20 A We did not end up doing rebates for this
21 particular -- and maybe the language there really was --
22 you know, it's a discounting process, but we did not do
23 this for this product launch. It was simply a replacement
24 of the existing product.

25 Q Since you've started with the company in October

1 of '97, have you had to provide rebates for other products
2 that you've marketed?

3 A On an ongoing basis, the marketing behind deli
4 products, it's not a very brand-focused type category.
5 When you go to a deli category, many times you will just
6 see the meat stripped out of the bag. There's not a lot of
7 branding. It's really a trade-driven business. So as a
8 matter of course, there are many trade discounts involved
9 in selling our products. There's less of a consumer focus
10 in general in the deli.

11 Q And I guess that's where my question was going. I
12 was going to ask you how you provide rebates as the -- as
13 it's -- that word is put here, to like the Albertson's or
14 the Wal-Marts?

15 A With this particular product --

16 Q You didn't have to?

17 A -- they were already carrying -- correct. But in
18 a -- let's just use another example. Let's say we were
19 introducing some new Butterball flavors. They may offer
20 some kind of slotting, it's called.

21 Q Uh-huh.

22 A Where basically that's your price of entry to get
23 a little piece of real estate in the deli case. But what
24 we do is we don't offer it as a matter of course. It's
25 negotiated on a customer-by-customer basis.

1 Q And you didn't have to provide any slotting
2 incentives either with any of the products launched --

3 A That's correct.

4 Q -- using the Maillose-browning process?

5 A That's correct.

6 Q Okay. I saw your Butterball segmentation. Do you
7 see that, segmentation? Now, do you produce any -- it says
8 flavored and it says chicken and support. Now, do you make
9 any products that are flavored using the Maillose-browning
10 process?

11 A No.

12 Q Okay. Let's go to the next document, 7887. Are
13 those the -- is that your handwriting?

14 A Yes.

15 Q Well, it's better than mine. What is that top two
16 words? What are those? What do those say?

17 A Lower profile.

18 Q What does that mean?

19 A That means the product, the shape of the product
20 was lower, less helmet and ball like and a little bit
21 flatter.

22 Q Okay. Now, is it fair for me to assume that since
23 the document that comes in front of this is dated January
24 29th, '98, which is the 7885 to 7886, and the document that
25 comes behind this page is February 17th of '98, which is

1 7888, that somewhere in between there is when you wrote
2 these notes? Somewhere in between those two dates is when
3 these notes were written by you?

4 A Somewhere in between, I believe, yes, this January
5 27th meeting and this meeting at 2/13 in the middle of the
6 page, my scribble.

7 Q Oh, okay. Good point.

8 A So somewhere in between there, I had notes from a
9 meeting. It looks like I added on notes from a subsequent
10 meeting to the bottom of that page.

11 Q The notes of this first meeting, do you know who
12 they were with? Do you know who the meeting was with?

13 A It looks like they're notes almost to myself.
14 Because then I have, over to the right, I said, "Memo to
15 the group." It appears that I was jotting a note to myself
16 that we needed to write a memo to the group. "Clear with
17 Stan." And let's see if Stan -- it might have been even
18 related to the memo that Stan had written earlier. If I
19 could comment on what the notes were about and if --

20 Q Sure. Go ahead.

21 A -- there's confusion. It's simply -- it looks
22 like the first bullet point, Maillose browned, that was one
23 of the options we were looking at. We were looking at oil
24 browning. My note reads, "Trying to get this with early
25 next week."

1 We looked at two different types of oil browning.
2 We were trying to optimize our current oil-browning
3 process. You can use different types of oils, so we were
4 looking at cottonseed versus corn. No whey. I just have a
5 couple of notes there.

6 Then the other product we were looking at, I had
7 written down "impingement." I don't believe that that's a
8 process that we have -- we don't have ovens that are
9 impingement ovens. Then I noted laser. It says, "Still
10 long-term." So this must have been notes from some
11 conversation that I had saying -- reviewing the options we
12 were looking at. And for example, on laser, you know, it
13 was still out there, it wasn't something we were
14 immediately pursuing.

15 Then it just notes that next Thursday, we'll -- it
16 looks like we'll review more product. So my guess is that
17 this was a meeting probably that I had with Stan. Then
18 here's another meeting with Stan. The next notes say
19 meeting 2/13 with Stan.

20 Q Does Stan still work for the company?

21 A Yes. He works -- yes, he does.

22 Q What area?

23 A He works for the food service side of the
24 business.

25 Q Okay. This next note, meeting 2/13. That's

1 meeting with Stan? Is that what that means?

2 A Yes. My chicken scratch. It says shape
3 underneath it. After all -- after this has been copied,
4 you know, so many times, it's starting to lose its
5 legibility. I can't -- I don't even know what that first
6 word is.

7 Somebody has a quote on the conversion, marketing
8 rationale, Tim Bentley. You know, I don't know what these
9 mean. I mean, these are notes from a meeting. And without
10 knowing the context that they were in...

11 What I would typically do, though, is take the
12 notes and summarize it in a fashion, which is reflected in
13 the rest of the documents here, so that it's something you
14 can turn into something meaningful for the group to act
15 upon.

16 Q Okay. Look down at the bottom, kind of explain
17 that to me. It has, "ORHC, ORBB." And then below that, it
18 has, "Oil brown. Will have samples."

19 A For Thursday. Shelf life not an issue.

20 Q Then the next --

21 A Then it says, "Koppens, Maillose samples from Red
22 Arrow supplier." Test -- then it says, "Test to be done at
23 Unitherm. Thanksgiving brown."

24 Q What does that mean? Do you know? Is that a
25 meeting with Stan and do you recall why you wrote that in

1 there?

2 A Yes. So he would have been again reviewing the
3 different options that we were exploring. We talked about
4 shape. Then we talked about oil browning. We talked about
5 what was going on with the Koppens oven.

6 Q Saying that Unitherm -- does that mean that it's a
7 Thanksgiving brown color?

8 A Yes. I wrote that, I think, because in an earlier
9 cutting, we had described that color. We liked that color
10 and described it as being a Thanksgiving brown in color.

11 Q Thanksgiving brown, is that a golden brown?

12 A Yes. I think that's fair to say.

13 Q Okay. Next document, 7888. February 17, '98 from
14 you to Stan Gershenson. Now, it says in this document,
15 almost the last line, that Stan is to be prepared --
16 correct me if I'm wrong -- is to be prepared to discuss the
17 browning process that he recommends. Do you recall which
18 browning process he recommended at that time?

19 A At the date of this memo, I did not know, because
20 I was requesting him...

21 Q Fair enough. I guess at the next meeting for
22 February 26th.

23 A Uh-huh.

24 Q Do you recall, as you look at this document, what
25 process he recommended?

1 A Okay. So I can look at -- so I should be looking
2 at 7889?

3 Q Yeah. Look at whatever you need to to answer that
4 question.

5 A Yeah. Actually, the 7889 is just telling people
6 we're having a cutting. But then it appears I used --
7 then I did a memo, 7890, that actually summarized what
8 happened at that cutting.

9 Q That 7890 is a March 3, '98 memo from you to a
10 number of people, that document; right?

11 A That's correct.

12 Q Okay. So did he tell you, based upon your review
13 of those documents, what process he recommended?

14 A It appears that there was no -- there was not a
15 resolution at this time, because the bullet point reads,
16 under Maillose in the middle, "Review the color and flavor
17 of various samples. The group agreed to target a darker
18 brown color. Testing at three suppliers will continue."
19 So Unitherm, Koppens and Stein were all, it appears to be,
20 still being looked at.

21 Q All right. So the "target a darker brown," is
22 that something different than a golden brown?

23 A I don't believe so. I think it was probably all
24 relative. If there were a couple of samples sitting there
25 and there were different shades of what you could all say

1 were -- looked to be golden brown, it appears that the
2 group reviewed and liked one that was a little bit darker,
3 but we all still believed that it could be called golden
4 brown in color.

5 Q What product -- excuse me. Was there Unitherm
6 product at that cutting?

7 A I believe so. I would guess.

8 Q Did you like the color of the product from
9 Unitherm, if you remember?

10 A If I remember -- I don't remember distinctly
11 between those three different samples, which was which. I
12 wouldn't remember that.

13 Q All right. I do see your notes here on the side.
14 What do those say?

15 A Yeah. It said Koppen...

16 MR. TOMLINSON: Closed.

17 THE WITNESS: Closed this week. So they were just
18 discussing the time line. Stein a week from Friday. We
19 was just discussing when he was going to get the new
20 samples.

21 MR. CASTRO: Bob, did you have anything to add?

22 MR. TOMLINSON: Huh-uh.

23 MR. CASTRO: Okay.

24 MR. TOMLINSON: Don't you agree that's what it
25 says?

1 MR. CASTRO: I could -- I don't know.

2 THE WITNESS: Was it -- I don't know why it was
3 closed.

4 Q (By Mr. Castro) Do you know when you sent product
5 to the Unitherm facility?

6 A I wouldn't have been involved in that level of
7 detail.

8 Q Okay. I skipped a document. The February 18th
9 memo from -- is it from you to a number of people?
10 Number 7889, can you identify that document?

11 A Yes. It's a document from me to the project team
12 telling them about the next cutting. And it just describes
13 that we're going to review product and here's our two
14 objectives for that meeting. We're going to talk about
15 shape and we're going to review the brown samples.

16 Q I notice at the -- the handwriting at the top, do
17 you see that, where it says Maillose, the handwriting at
18 the top right?

19 A Yes.

20 Q Can you read what that is beside Maillose?

21 A "Try Koppens again to put up -- and put up product
22 for shelf life."

23 Q Were you having problems with the consistency --

24 MR. TOMLINSON: Where?

25 Q (By Mr. Castro) Were you having problems with the

1 consistency of the product being produced from the Koppens
2 oven at that time?

3 A I don't recall. I don't believe so.

4 Q Do you know why you would have been trying the
5 Koppens again?

6 A I think just because, again, we weren't coming to
7 an agreement. We needed to review some more samples.

8 Q You weren't coming to an agreement on what?

9 A On the color.

10 Q On the color?

11 A Right.

12 Q What was the dispute over? The lighter versus
13 darker?

14 MR. TOMLINSON: Object to the form of the
15 question.

16 THE WITNESS: We reviewed product with various
17 ranges of colors, so for the group to kind of agree on what
18 they liked or didn't like, you know, there apparently
19 wasn't resolution at this time on that.

20 Q (By Mr. Castro) Okay.

21 A Nothing more than that, really.

22 Q Now, I see down here suppliers. Do you see that?
23 Your handwritten notes, it says, "Unitherm, Koppens,
24 Stein." Is that what those say?

25 A That's correct.

1 Q So at that time, were those the three potential
2 suppliers for the ovens that were going to do this
3 browning?

4 A That's correct.

5 Q And your writing here, reviewed lighter. What
6 does that mean?

7 A What that meant, Unitherm, when we reviewed the
8 samples, I wrote that they were lighter. So they were
9 lighter in color versus the Koppens. A different brown --
10 I don't know what that word is. Different basting. Need
11 to look at different ovens. It's a dry heat process, so we
12 were still exploring the Koppens, it appears.

13 Q Were you still exploring the Unitherm?

14 A Yes. I believe so. Because it's one of these
15 three. Correct.

16 Q Uh-huh. There's an arrow there that says, "Look
17 for consistency." That's right under that whatever that
18 word is. Different basting maybe?

19 A Yeah.

20 Q Were you having problems with the consistency of
21 the Koppens product?

22 A I don't recall.

23 Q As of this date, had you tried any product in the
24 Stein oven?

25 A Week of March 16th. It appears that as of this

1 date, we hadn't perhaps seen any Stein, I don't think.
2 Because it's saying week of March 16th, we'll see it.
3 We'll see it later.

4 Q Okay. What oven did you buy to -- what's the
5 first oven you bought to do this Maillose browning? Do you
6 know?

7 A I don't know. I'm not close to that. Yeah.

8 Q Okay. You said -- you have a bracket there. It
9 says, "Need to look at different ovens." Do you know what
10 that means?

11 A Other than just, you know, I was just jotting
12 things that were said in the meeting. And it was, again,
13 the technology folks discussing that, so I don't remember
14 in a lot of detail what that discussion was about.

15 Q Do you remember anything about what this comment
16 means?

17 A Need -- no, I don't. "Need to look at different
18 ovens." It definitely related to just Unitherm and
19 Koppens. I think there was probably a general discussion
20 about that we're exploring it, we need to look at different
21 things. Again, this was all driven by the research and
22 development folks.

23 Q Well, were you wanting to look at other ovens
24 other than the Unitherm and the Koppens oven? I don't
25 understand what you mean. Do you know?

1 A No, I don't.

2 Q Okay. The next document, please help me. I --
3 it's 7891, Maillose project update. Is that just a single
4 document or does that go with some of these other pages
5 that come behind it?

6 A I believe it goes with the page right behind it.

7 Q Which would be 7892?

8 A Yes.

9 Q Does it go with 7893?

10 A No. 7893 is a document that I put together.

11 Q Okay. Who prepared this 7891, if you know?

12 A It was either, again, Prem or Stan.

13 Q Now, it says here, in your own handwriting, ring
14 -- or is this your handwriting?

15 A It is my handwriting.

16 Q Ring -- in quotes, "ring update." What does that
17 mean?

18 A There were -- with some of the Maillose samples
19 that we were reviewing, we were seeing a ring, like a gray
20 ring around the outside. If you take a turkey breast and
21 you cut it in half and you look at it in a sliced basis, we
22 would see a dark gray ring around the product. And there
23 was some concern about that.

24 Q Help me. You mean when you cut it in half?

25 A Uh-huh.

1 Q Would the gray ring be as if it's on the meat?

2 A Close to the surface of the product, so around
3 where it's brown, between that and the meat -- you know, to
4 the very edge.

5 Q How thick was the ring?

6 A Very small, you know. (Indicating).

7 Q Eighth of an inch?

8 A Yes.

9 Q Do you know which product -- let me try that over.
10 Do you know which supplier was providing you
11 product that had the ring?

12 A No, I don't.

13 Q It has pren, Boston. Is that Boston?

14 A This says, "Pilot plant Boston no ring." So
15 perhaps what was going on was we would ask about have we
16 been able to get rid of the ring. I mean, the ring was
17 just a concern from a visual standpoint. And perhaps Stan
18 was saying -- or Prem, I'm sorry -- was saying at the pilot
19 plant in Boston -- so that must be where a supplier has a
20 plant -- that they weren't getting a ring when they
21 controlled -- you can read my comments over to the right.

22 When they controlled the amount of time in the dip
23 tank and before it went in the oven, 15 seconds versus 20
24 seconds, so this is technical stuff about trying to
25 eliminate the ring.

1 Q Okay. Does Armour Swift-Eckrich have a pilot
2 plant in Boston?

3 A No. I don't believe so. The only pilot plant
4 that I'm aware of is in Downers Grove.

5 Q Okay. What's this next page? Do you know?

6 A This is a simple chart that outlines the process
7 that a turkey breast done through the Maillose system would
8 go through. So as an example, you start out, the left box,
9 it says inject. That's when you inject the meat with a
10 solution. Then you tumble the product. It's a technical
11 chart that outlines the process by which turkey breast is
12 made.

13 Q You mean turkey breast using this Maillose
14 process?

15 A In this case, you can see with that arrow that
16 they've added the Maillose piece of it. Many of our turkey
17 breasts go through many of these processes. But yes. This
18 one is specific to the Maillose process.

19 Q All right. About done. 7893, May 8th, '98. Can
20 you identify that document?

21 A This -- these were meeting notes that I put
22 together. This actually was more like an agenda for a
23 project team meeting. These were the things that the group
24 was going to talk about on this date. So our two
25 discussion topics, one was the food service topic and one

1 was -- and then the other bullet point was about different
2 aspects of the projects at hand.

3 And then it has a series of notes that I've
4 written on that must be notes that were taken during the
5 project team meeting.

6 Q At this point in time, had you made a
7 determination of which supplier to use for the oven to
8 perform this Maillose browning?

9 A I'm not aware of that. Again, I mean, from a
10 marketing standpoint, I was not heavily involved in the R&D
11 and technical side of this. I don't have that time line.
12 I have a series of time lines as represented by these
13 meeting notes, but it's not detailed to that level as to
14 when specific R&D decisions were being made.

15 Q All right. I see here it says, "Project status
16 time line. Healthy Choice formula change." Do you see
17 that?

18 A Correct.

19 Q Okay. And then I just had a question. It says,
20 "Within next two weeks, initiate sensory." Is that what
21 that says or does it say something else? I'm sorry. Do
22 you see that?

23 A Yes. I see.

24 Q Do you recall what that means?

25 A Yes, I do. The Healthy Choice product, because

1 it's a significant brand name within the organization,
2 within ConAgra Foods, there are brand standards that have
3 to be maintained for that product. So when any of the
4 individual operating companies launches a Healthy Choice
5 product, you have to do sensory -- you have to do product
6 testing to ensure that if you're, for example, improving a
7 product, that you're really improving a product, that
8 you're not bringing out something that's lower quality.

9 And so basically, we said within next two weeks,
10 initiate sensory. So we were starting our product testing.

11 Q What did that consist of?

12 A There is a sensory facility in Downers Grove.
13 Basically, we use those facilities to talk to consumers.
14 We put the product in front of the consumers. So what that
15 would involve in the case of Healthy Choice, for example,
16 would be we would put a whole turkey breast that was the
17 old one, the white, all white. And then we would put the
18 new one out, the new and improved. And we --

19 Q The one using the Maillose process?

20 A That's correct.

21 Q Okay.

22 A And we would obtain their reactions to different
23 questions about how it looked, and then also on a sliced
24 basis, how it tasted.

25 Q Did you record that type of information on -- how

1 did you record that type of information?

2 MR. TOMLINSON: Object to the form of the
3 question.

4 THE WITNESS: The sensory group has a process by
5 which they record that.

6 Q (By Mr. Castro) Do they do that in writing?

7 A They would issue a report whenever a sensory test
8 is done. They would issue a report that would say how it
9 did.

10 Q Did you see a copy of that report?

11 A Well, you know, I think what happened with this,
12 frankly, is that we did a -- a bigger research study, which
13 is all documented in our sales binder. We did a full
14 product test, which is more disciplined and broader than a
15 sensory test, because sensory is really considered to be an
16 internal process, managed by the company as opposed to
17 having an independent researcher do work. And one of the
18 product tests that we did is documented in the sales
19 binder, was a product test on Healthy Choice. And we made
20 sure that our product was improved. And so all of that is
21 documented in that sales binder.

22 Q Well, do you know which ovens you used to make the
23 product, the new and improved product, as you've testified?

24 A Yes. When we did product testing in the market
25 research area, we would out -- we would use the product

1 that was produced using the Maillose oven.

2 Q Okay. Which ovens? Do you know? I mean, did you
3 use a Unitherm oven? Did you use a Koppens oven? Did you
4 use a Stein oven? Did you use all three?

5 A It would have been the oven that we purchased and
6 installed and put in place in December of '98. Okay. So
7 for this testing, this is what -- let me be clear. I'm not
8 sure we did the sensory testing. We talked about doing it.
9 But what we did was we waited until the oven was in place.
10 We actually waited a whole year. And when we were in the
11 market, we did product testing. That's, frankly, more
12 relevant here. And that testing is described and
13 documented in the sales binder.

14 Q You may have answered this in February. When did
15 you submit this sales binder to the salespeople, this
16 Exhibit No. 9?

17 A In October of...

18 MR. TOMLINSON: It's right here. (Indicating).

19 THE WITNESS: '98. 1998. Correct.

20 Q (By Mr. Castro) So it's still your testimony,
21 though, that whatever sensory testing results are in this
22 Exhibit 9 would --

23 A Whatever market research work had been done. And
24 the more disciplined market research is documented in
25 there. If there was any sensory type work that had gone

1 on, again, that's just in-house work. It's not --

2 Q Right.

3 A It's just used for guiding.

4 Q Right.

5 A It's really not used as a sell-in tool.

6 Q Right.

7 A But all of the three research studies that we did
8 are clearly articulated in that binder.

9 Q And you would have produced the product that you
10 compared with the old white or the white turkey product,
11 you would have made that new product, the new and improved
12 product, with the oven that was already purchased and
13 installed in your facility? Is that your testimony?

14 A I believe so.

15 Q Okay. Now, so is it your testimony here today
16 that you didn't do any internal sensory testing?

17 A I would have to go back and dig that up, if we
18 did.

19 Q Have you -- would there be records of that sensory
20 testing then?

21 A Possibly. If, in fact, we did it. But what we
22 did, again, was a more disciplined approach by using an
23 outside supplier and --

24 Q I understand that. I understand you ultimately
25 did that.

1 A Right.

2 Q But what I'm asking about is what you've written
3 here that within the next two weeks, we're going to
4 initiate sensory testing?

5 A Right. Because I don't see sensory described in
6 any of the future project team memos, I think we walked
7 away from it and we didn't do anything with it.

8 Q Do you think --

9 A Because we chose to do product testing. We chose
10 to do a more disciplined approach.

11 Q Is there anything that you could check to verify
12 whether that, in fact, was done or not?

13 A Sure.

14 Q Okay. And let your counsel know.

15 MR. CASTRO: Is that fair, Bob?

16 MR. TOMLINSON: Is it fair for her to check and
17 let me know?

18 MR. CASTRO: Yeah. And let you know there's none,
19 there's not?

20 MR. TOMLINSON: I'll let you know. She'll check.

21 Q (By Mr. Castro) And just out of curiosity, I don't
22 understand your notes here at the bottom. You have
23 something that says maybe issues both -- what -- where it
24 says Jonesboro, what is --

25 A "Issue: Both -- if both made in Jonesboro. If

1 it's Maillose, we need to ship to Longmont. If it's oil
2 browned, it can stay in Jonesboro."

3 Q What do you mean by that? Do you know?

4 A I'm trying to remember. I don't recall.

5 Q If you can't, that's okay.

6 A I don't recall.

7 MR. TOMLINSON: I think your questions about that
8 will be answered by the next document, which is a recap of
9 that.

10 Q (By Mr. Castro) Let's look at 7894, a memo from
11 you to the group again, May 11th of '98.

12 A Thank you. The last bullet point on that page. I
13 mean, it's hard to remember from meeting notes from a long
14 time ago. But there must have been some discussion that if
15 we -- this is back to the chicken discussion. Both Healthy
16 Choice and Butterball chicken are currently made in
17 Jonesboro. If we moved away from oil browning and
18 Maillosed them, then we would have to ship the product to
19 Longmont.

20 Q And it's your understanding that you never
21 produced any of this Maillose chicken product?

22 A Yes. That's correct. That it remained oil
23 browned.

24 Q Okay. Just for clarification, do you see the
25 second bullet point where it says, "Impact of, quote,

1 browned, end quote, change on food service"? Browning, does
2 that mean the new product launch browning?

3 A Yes.

4 Q Okay.

5 A What that referred to is, again, because the food
6 service business is operated separately from deli, as the
7 project person, I had invited someone from the food service
8 group to participate in our project team so that they could
9 hear what was going on and evaluate whether there was any
10 impact on the food service business. These bullet points
11 simply state that Paul Petrilich, an individual who
12 represented food service, came to the meeting, understood
13 what we were doing in the area of Butterball, and said
14 there aren't any big issues.

15 And then in the area of Healthy Choice, it
16 appeared that he -- you know, more work had to be done to
17 evaluate and see if there were any impact on the food
18 service business.

19 Q And that's something that the fellow on Friday can
20 speak to?

21 A That's correct.

22 Q Jim McConnell. Yeah. Okay.

23 The last document, do you know -- let's see. This
24 is May of '98. Do you know when this last document was
25 prepared? Did you prepare this last document? And that is

1 7895.

2 A I was going on maternity leave at this time frame.
3 And I believe my boss, Deb Billow, at the time prepared
4 this document. But I can speak to the document, but I --
5 there was a time frame between the end of May and early
6 August when I was -- when I was on maternity leave.

7 But upon further reflection, seeing that it has my
8 notes on it, you know, I was probably around still.

9 Q Yeah. And I wasn't trying to trick you.

10 A Yeah. So I probably did create this document. It
11 just didn't look as familiar.

12 Q I'm just trying to determine here now on Number 3,
13 it says, "Color ring test Koppens." Does that refresh your
14 memory that you were having problems with color rings with
15 the Koppens-produced product?

16 MR. TOMLINSON: Object to the form of the
17 question.

18 THE WITNESS: There may have been more -- I mean
19 Koppens -- that apparently was an issue for Koppens. I
20 don't remember if it was an issue for any of the other
21 suppliers as well.

22 Q (By Mr. Castro) Do you in fact remember whether it
23 was an issue with the Koppens oven?

24 A Well now that jogged my memory that, you know, if
25 it says Koppens, it probably was.

1 Q Thank you.

2 MR. CASTRO: I'm about done, Bob. I want to look
3 at one thing in here that she...

4 Q (By Mr. Castro) Let me show you -- I only have one
5 copy, but let me make sure we're clear here. Do you see
6 Bates stamp -- this is, by the way, Exhibit No. 9. And we
7 have here Bates-stamp No. 7566.

8 "Deli consumers tell us we're making changes for
9 the better. We've done our homework." We've discussed the
10 Moskowitz appraisal. And now you've listed here the oven
11 roasted deli turkey product test by Luhrs, May of '98,
12 competitive deli breast product test, Luhrs, September of
13 '98.

14 Are those the sensory tests that you testified to
15 previously?

16 A No, they're not. They're the --

17 Q Okay.

18 A -- outside.

19 Q Oh, those are the outside tests?

20 A That's correct.

21 Q Were these tests done with the oven that was
22 already installed in Armour Swift-Eckrich that was going to
23 produce the Maillose-browned product?

24 A I don't know exactly when that oven was installed,
25 but I believe -- I mean, you typically do consumer research

1 with the product that you're -- is going to end up
2 introducing into the marketplace. So I don't remember --

3 Q Makes sense to me.

4 A -- exactly, but I assume that if it was for the
5 product, that it was done using the ovens that were
6 installed.

7 MR. CASTRO: Okay. Bob, let me look at my notes.
8 I think I'm generally done.

9 (Short Break)

10 Q (By Mr. Castro) In the studies, in the Moskowitz
11 study -- did I pronounce that right? Or any other studies
12 you reviewed in this products -- when these products were
13 launched -- by "products," I mean the ones using the, as
14 you described it, the Maillose-browning process.

15 Did you do any analysis of whether customers
16 bought a product, a white turkey product, because it may
17 have been cheaper than a browned turkey product?

18 A We didn't do any special analysis. I think
19 there's common knowledge that there's different quality
20 tiers in the industry and that a browner, higher quality
21 looking turkey breast, there's a market for that, and then
22 also in some accounts in some areas of the country where
23 the cheaper product is a better seller. It just depends on
24 the customer.

25 Q Okay. But you don't know whether customers buy

1 the white turkey product because it may be cheaper than the
2 browned or smoked product?

3 MR. TOMLINSON: Objection. Asked and answered.

4 Q (By Mr. Castro) Go ahead.

5 A I'm sure that's -- again, there's a price issue,
6 so, but certain -- but the -- again, there's different
7 quality tiers. And it's advantageous perhaps to try to
8 move people up into a different quality tier because you
9 can command a little bit higher price when it's better
10 quality turkey breast. And Butterball is a brand that
11 should carry a higher quality level.

12 Q Even though it's a little bit more expensive,
13 people are still going to buy it? Is that fair to say?

14 A Absolutely. Yeah. Absolutely. Sure. Because
15 it's a quality. Their price-value is there. They have a
16 good experience with the product. It's higher quality, so
17 they're willing to pay a price for a little bit more.

18 MR. CASTRO: That's all I have. Thanks.

19 MR. TOMLINSON: Read and sign.

20 (Witness excused)

JURAT

I, Susan Burns, do hereby state under oath that I have read the above and foregoing deposition in its entirety and that the same is a full, true, and correct transcription of my testimony so given at said time and place, except for the corrections noted.

Subscribed and sworn to before me, the undersigned Notary Public in and for the State of _____, on this, the ____ day of _____ 2002.

NOTARY PUBLIC

My Commission Expires: _____

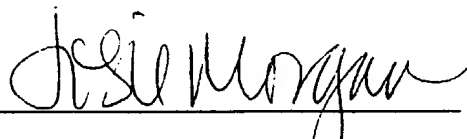
Reported by: Lori A. Johnston, CSR, RPR

C E R T I F I C A T E

STATE OF OKLAHOMA)
) SS:
COUNTY OF OKLAHOMA)

I, Lori A. Johnston, a Certified Shorthand Reporter for the State of Oklahoma, certify that Susan Burns was by me sworn to testify the truth; that the deposition was taken by me in stenotype and thereafter transcribed by computer and is a true and correct transcript of the testimony of the witness; that the deposition was taken by me on December 10, 2002, at 1:00 p.m., at 101 North Robinson, Oklahoma City, Oklahoma; that I am not an attorney for or relative of either party, or otherwise interested in this action.

Witness my hand and seal of office on this 30th day of December 2002.



Authorized Representative for
Lori A. Johnston, CSR, RPR

Lori Johnston
Oklahoma Certified Shorthand Reporter
Certificate No. 01726
Exp. Date: December 31, 2002

ERRATA SHEET

WITNESS: Susan Burns

STYLE: Unitherm v Swift-Eckrich

REPORTER: Lori A. Johnston, CSR, RPR

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Total US Deli Poultry Brand Ranking

13 week period per quarter
Source: Freshlook Data

Poultry - Total US Brand Rank 1-50	Week ending	
	8/26/01	5/27/01
	Q1 02	Q4 01
PRIVATE LABEL	13.2%	13.9%
BRANDED PRIVATE LABEL	12.1%	9.2%
BOARS HEAD	9.7%	10.3%
JENNIE O	9.2%	10.3%
BUTTERBALL	9.1%	9.2%
SARA LEE	9.0%	10.0%
HEALTHY CHOICE	5.1%	4.8%
CAROLINA	3.9%	3.2%
DIETZ & WATSON	2.8%	2.7%
KENTUCKY GOLD	2.0%	1.7%
HORMEL	1.7%	1.9%
HONEYSUCKLE WHITE	1.6%	1.3%
MARVAL	1.4%	1.4%
WILLOWBROOK FARMS	1.3%	0.9%
PERDUE FARMS	1.2%	1.2%
PLAINVILLE	1.2%	1.1%
WAMPLER	1.1%	1.1%
APPLGATE FARMS	1.1%	1.2%
PLANTATION	1.1%	1.3%
SENSATIONAL	1.0%	0.9%
LOUIS RICH	0.9%	0.9%
SNOWBALL	0.7%	0.8%
WILSON	0.6%	0.8%
EAGLE VALLEY	0.6%	1.0%
DELI PERFECTION	0.6%	1.0%
BIL MAR	0.6%	0.5%
LONGMONT	0.5%	0.5%
THUMMANS	0.6%	0.4%
SHADY BROOK	0.4%	0.4%
MANDA	0.4%	0.5%
WILLIAMS	0.4%	0.3%
JORDAN	0.4%	0.5%
SWIFT PREMIUM	0.3%	0.3%
THIN & THIN	0.3%	0.3%
GOURMET RECIPE	0.3%	0.3%
TURKEY STORE	0.3%	0.3%
COPPERFIELD	0.3%	0.3%
FOSTER FARMS	0.2%	0.4%
EXECUTIVE CHEF	0.2%	0.2%
ZACKY FARMS	0.2%	0.2%
COLUMBUS	0.2%	0.2%
REMARKABLE	0.2%	0.1%
SWIFT	0.2%	0.0%
EMPIRE	0.1%	0.2%
WHITE GEM	0.1%	0.1%
GOYA	0.1%	0.1%
PILGRIMS PRIDE	0.1%	0.1%
ALPINE LACE	0.1%	0.1%
NORTHWESTERN	0.1%	0.1%
FARMLAND	0.1%	0.1%
SAULEN	0.1%	0.2%
HUDSON	0.1%	0.1%
GLEN ROCK	0.1%	0.0%
CARANDO	0.1%	0.0%
BROADWAY FAMOUS	0.1%	0.1%
CHAEVE	0.1%	0.1%

Poultry - Total US Brand Rank 1-50	Week ending	
	8/26/01	5/27/01
	Q1 02	Q4 01
SUPERIOR	0.1%	0.1%
SMOKED MOUNTAIN	0.1%	0.1%
BRIAR STREET MARK	0.1%	0.1%
DEMAKES	0.0%	0.0%
DELI SELECT	0.0%	0.0%
RIVER SIDE	0.0%	0.0%
KAYEM	0.0%	0.1%
SMOKEHOUSE	0.0%	0.0%
HEBREW NATIONAL	0.0%	0.0%
RUSSEY	0.0%	0.0%
EMIL	0.0%	0.0%
VIENNA	0.0%	0.0%
ARMOUR	0.0%	0.0%
HILLSHIRE FARMS	0.0%	0.0%
FAIRFIELD FARMS	0.0%	0.0%
WEAVER	0.0%	0.0%
DUBUQUE	0.0%	0.0%
FISCHERS	0.0%	0.0%
KUTZTOWN	0.0%	0.0%
SPRINGBROOK	0.0%	0.0%
VOLPINO	0.0%	0.0%
OLD WISCONSIN	0.0%	0.0%
BURNETTS	0.0%	0.0%
PATRICK CUDAHY	0.0%	0.0%
JOHN CHAS	0.0%	0.0%
BILINSKI	0.0%	0.0%
HARVEST PROVISION	0.0%	0.0%
BATTISTONI	0.0%	0.0%
MOSEY	0.0%	0.0%
KUNZLER	0.0%	0.0%
TRIPLE M	0.0%	0.0%
NORSEBT	0.0%	0.0%
MCKENZIE	0.0%	0.0%
BOLLOS	0.0%	0.0%
SCHWEIGERT	0.0%	0.0%
SCHALLER & WEBER	0.0%	0.0%
AARONS	0.0%	0.0%
BRYAN	0.0%	0.0%
ECKRICH	0.0%	0.0%
SUNSHED	0.0%	0.0%
BEST	0.0%	0.0%
DELI QUICK	0.0%	0.0%
SMOKEY MOUNTAIN	0.0%	0.0%
GLATT	0.0%	0.0%
SUNDAY HOUSE	0.0%	0.0%
USINGER	0.0%	0.0%
NUESKE	0.0%	0.0%
SAVAL	0.0%	0.0%
WILLIAMSBURG	0.0%	0.0%
ADOBO	0.0%	0.0%
FRESHGO	0.0%	0.0%
SHOFAR	0.0%	0.0%
SMITHFIELD	0.0%	0.0%
TYSON	0.0%	0.0%
BELL & EVANS	0.0%	0.0%
KLEMENT	0.0%	0.0%



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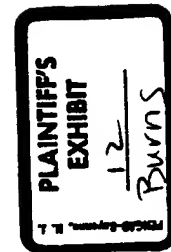
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DELI-SCAN™

Ranking of Sales Areas By Market Volume
1994 Supermarket Service Dells
Poultry Total

Rank	Sales Area	1994					1993		1993-1994	
		Market (\$000)	% Total	ASE (\$000)	Share of Area	Weighted CDI	Market (\$000)	ASE (\$000)	% Change Market	ASE
1	001-Northeast Region	104,040	31.3	9,891	5.4	138	159,999	7,552	2.5	17.3
2	003-North Central Region	73,969	14.2	7,835	10.6	137	70,916	6,422	4.8	22.0
3	007-Western Region	67,349	12.8	6,341	9.4	89	65,023	5,707	3.6	11.1
4	006-Southwest Region	63,960	12.2	3,250	5.1	87	60,356	2,331	5.5	39.4
5	004-Midwest Region	58,539	11.3	3,355	6.7	74	56,944	3,614	3.5	-7.2
6	002-Southeast Region	49,395	9.5	8,350	18.9	85	44,318	10,512	11.5	-11.1
7	008-Southern Region	43,110	8.3	1,105	2.9	68	40,326	1,281	6.9	-13.7
	U.S. TOTAL	330,110		40,897	100.0		497,167	37,420	4.8	7.3



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Consolidated with Exhibit 1005

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Ranking of Sales Areas By Market Volume
1984 Supermarket Service Delis
Turkey Breaal Total

Rank	Sales Area	1984				1983				1983-1984	
		Market (\$000)	% Total	ASE (\$000)	Share of Area	BDI	CDI	Weighted CDI	Market (\$000)	ASE (\$000)	% Change Market ASE
1	001-Northeast Region	130,134	31.0	7,957	6.1	72	134	291	124,130	6,666	4.6
2	003-North Central Region	57,406	13.7	6,984	12.1	143	69	95	58,879	5,432	6.6
3	006-Southwest Region	52,272	12.5	2,721	6.2	61	89	76	46,497	1,973	7.8
4	007-Western Region	51,888	12.4	5,752	11.1	131	85	74	49,070	5,172	6.6
5	004-Midwest Region	49,463	11.8	2,997	8.1	71	104	86	46,874	3,184	6.0
6	002-Southeast Region	40,830	9.7	8,314	20.4	240	90	61	38,729	6,862	14.3
7	005-Southern Region	37,961	8.9	813	2.5	30	78	46	34,887	1,190	7.7
	U.S. TOTAL	416,302		38,846	100.0				382,668	32,868	6.8

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DELS-SCANSM

Ranking of Sales Areas By Market Volume
1994 Supermarket Service Dells
Oven Roasted/Prepared Turkey Breast

Rank	Sales Area	1994				1993				1993-1994	
		Market (\$000)	% Total	ASE (\$000)	Share of Area	Weighted CDI	BDI	CDI	Market (\$000)	ASE (\$000)	% Change Market ASE
1	913-New York Territory	20,253	7.7	1,855	9.2	107	98	107	19,614	1,827	3.3
2	074-Boston Territory	19,162	7.3	28	0.1	241	2	241	19,151	33	0.0
3	917-Baltimore/Washington Territory	13,011	5.0	536	4.1	44	44	132	11,871	830	8.7
4	918-Los Angeles Territory	12,727	4.9	2,727	21.4	67	228	67	12,451	2,513	2.2
5	899-Tampa Territory	8,664	3.3	1,742	20.1	157	214	157	7,644	1,620	10.5
6	828-Springfield/Hanford Territory	8,348	3.2	1,269	15.2	178	162	178	8,049	316	7.6
7	928-San Francisco Territory	8,088	3.1	2,029	25.1	109	268	109	8,536	1,824	5.3
8	916-Maine Territory	6,462	2.6	493	7.6	136	61	136	6,330	666	2.1
9	921-Grand Rapids Territory	6,259	2.4	701	11.2	119	119	119	6,357	670	18.8
10	920-Chicago Territory	6,170	2.4	511	8.3	118	88	118	6,223	670	-0.9
11	930-Phoenix Territory	5,876	2.2	161	2.7	29	29	29	6,601	101	-11.0
12	923-Buffalo Territory	5,661	2.0	838	5.7	61	153	61	5,451	377	7.6
13	943-Seattle Territory	5,351	2.0	18	0.3	98	3	98	4,859	33	10.1
14	908-Pittsburgh Territory	5,255	2.0	791	15.0	112	160	112	5,017	381	4.7
15	857-Minneapolis Territory	5,076	1.9	-4	0.0	118	0	118	4,845	23	4.7
16	918-Cleveland Territory	4,781	1.8	329	6.9	156	74	156	4,787	329	0.6
17	912-Salt Lake City Territory	4,748	1.8	4	0.1	145	1	145	3,647	4	23.4
18	909-San Antonio Territory	4,732	1.8	303	6.4	114	68	114	4,184	117	12.8
19	940-Dallas Territory	4,714	1.8	458	9.7	104	104	104	4,182	330	12.7
20	941-Kansas City Territory	4,667	1.8	117	2.6	83	27	83	4,532	119	2.5
21	911-Columbus Territory	4,653	1.8	199	4.8	160	46	160	8,815	59	22.0
22	918-Charlotte Territory	4,612	1.8	126	2.7	29	29	29	9,987	162	16.3
23	918-Philadelphia Territory	4,516	1.7	725	16.0	171	130	157	4,958	627	-8.9
24	902-Milwaukee Territory	4,492	1.7	277	6.2	163	68	163	4,181	207	7.4
25	903-Indianapolis Territory	4,437	1.7	480	10.8	115	115	139	4,319	429	2.7
26	909-Milwaukee Territory	3,920	1.5	2,478	63.3	674	674	71	3,913	2,919	0.2
27	926-Denver Territory	3,730	1.4	17	0.5	65	5	65	3,897	17	0.9
28	900-San Antonio Territory	3,674	1.4	572	15.8	166	166	107	3,584	566	2.6
29	905-Richmond Territory	3,495	1.3	13	0.4	105	4	105	3,358	74	4.1
30	940-Chicago Territory	3,480	1.3	396	11.4	122	122	131	3,264	589	6.0
31	802-Houston Territory	3,453	1.3	172	5.0	53	53	84	3,970	178	-5.9
32	928-Atlanta Territory	3,318	1.3	388	11.1	118	118	74	2,917	323	13.7
33	903-Syracuse Territory	3,286	1.3	14	0.4	168	5	168	2,731	4	20.3
34	938-Albany Territory	3,119	1.2	258	8.9	160	68	126	3,106	280	0.5
35	931-Nashville Territory	3,108	1.2	88	2.2	24	24	143	3,159	50	-1.7
36	953-St. Louis Territory	3,043	1.2	281	9.2	98	98	78	2,914	316	4.4
37	917-Des Moines Territory	2,929	1.1	8	0.3	138	3	138	2,809	14	4.3
38	902-Fort Wayne Territory	2,911	1.1	454	16.6	103	103	80	2,816	965	3.4
39	932-Memphis Territory	2,601	1.0	62	2.4	59	26	59	2,568	64	1.3
40	922-Detroit Territory	2,450	0.9	132	5.4	83	57	83	2,878	166	-14.7

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Continued on MTN Group 1995

DELI-SCAN™

Ranking of Sales Areas By Market Volume 1994 Supermarket Service Delis Oven Roasted/Prepared Turkey Breast

Rank	Sales Area	1994				1993				1993-1994	
		Market (\$000)	% Total	ASE (\$000)	Share of Area	BDI	CDI	Weighted CDI	Market (\$000)	ASE (\$000)	% Change Market ASE
41	838-Greenville Territory	2,306	0.9	178	7.6	81	104	64	2,095	202	10.6
42	801-Jacksonville Territory	2,194	0.8	1,156	62.7	862	84	49	2,155	1,585	1.8
43	814-Portland Territory	1,926	0.7	13	0.7	7	41	21	1,784	62	0.0
44	806-Louisville Territory	1,878	0.7	285	15.2	162	92	46	1,776	278	5.5
45	811-New Orleans Territory	1,762	0.7	176	10.1	106	82	24	1,756	208	0.4
46	828-Onaka Territory	1,455	0.6	12	0.6	9	58	21	1,404	20	3.6
47	801-Peoria Territory	1,438	0.6	68	4.7	80	60	29	1,506	69	-4.5
48	825-Toledo Territory	1,410	0.5	97	6.9	74	80	80	1,471	111	-4.1
49	836-Roseville Territory	1,281	0.5	4	0.3	3	172	59	1,220	4	5.6
50	809-Montgomery Territory	1,268	0.5	0	0.0	0	73	25	1,140	7	13.0
51	833-Raleigh Territory	1,198	0.5	95	8.0	85	58	19	1,177	118	1.8
52	817-Oklahoma Territory	1,177	0.4	56	4.7	50	48	14	1,165	77	1.0
53	837-Spokane Territory	1,166	0.4	0	0.0	0	85	28	1,049	0	10.6
54	819-Lubbock Territory	1,141	0.4	348	30.3	328	43	19	1,126	180	1.4
55	834-Huntington Territory	1,020	0.4	29	2.5	30	140	38	985	32	3.6
56	804-Quad Cities Territory	980	0.4	6	0.5	9	66	22	964	18	-5.5
57	812-Mobile/Fenwick Territory	952	0.3	5	0.6	6	72	17	920	7	-3.0
58	829-Evanston Territory	956	0.3	64	7.4	78	46	11	967	68	-2.1
59	808-Chattanooga Territory	793	0.3	87	4.7	80	65	14	756	28	3.7
60	837-South Bend Territory	716	0.3	79	11.1	116	84	16	704	60	1.6
61	816-Little Rock Territory	696	0.3	2	0.4	4	80	17	727	3	-4.3
62	816-Fargo Territory	660	0.3	19	2.6	28	62	11	677	41	17.9
63	828-Bristol Territory	661	0.3	37	6.6	59	81	11	675	44	-2.1
64	820-Burlingame Territory	466	0.2	3	0.6	7	51	6	416	4	12.0
65	834-Charleston Territory	462	0.2	71	15.4	184	66	8	484	56	-4.5
66	807-Birmingham Territory	344	0.1	120	34.6	871	8	1	308	26	11.7
67	814-Bethlehem Territory	267	0.1	68	30.0	820	73	6	286	37	-0.3
68	823-El Paso Territory	6	0.0	3	43.9	468	6	0	26	3	-78.9
69	819-Monroe, LA Territory	0	0.0	0	0.0	0	0	0	0	0	0.0
70	821-Albuquerque Territory	0	0.0	0	0.0	0	0	0	0	0	0.0
	U.S. TOTAL	281,803	0.0	24,863	100.0	0	0	0	281,872	23,136	3.6

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Ranking of Sales Areas By Market Volume
1988 Supermarket Service Dells
Poultry Total

Rank	Sales Area	1988				1987				1987-1988	
		Market (\$000)	% Total	ASE (\$000)	Share of Atm	BVL	CDL	Weighted CDL	Market (\$000)	ASE (\$000)	% Change Market ASE
1	813-New York Territory	46,827	7.5	966	2.1	28	113	695	48,928	2,124	-4.3
2	074-Boston Territory	43,823	7.3	82	0.2	2	188	973	42,025	232	8.3
3	977-Baltimore/Washington Territory	34,449	6.6	1,201	3.7	60	146	566	33,621	908	2.6
4	919-Los Angeles Territory	29,418	4.7	2,285	7.8	104	78	248	28,089	2,538	4.8
5	928-San Francisco Territory	24,067	3.9	3,222	13.4	178	90	268	23,724	3,511	1.4
6	608-Charlotte Territory	19,281	3.1	3,682	18.6	248	68	121	18,388	3,343	4.7
7	699-Tampa Territory	17,189	2.8	2,905	13.4	179	98	180	16,548	3,388	3.9
8	687-Memphis Territory	16,422	2.6	231	1.4	19	116	212	15,947	178	3.0
9	685-San Antonio Territory	16,404	2.6	1,326	9.3	124	129	298	16,405	1,147	6.5
10	830-Phoenix Territory	16,312	2.6	68	0.4	6	97	178	16,835	135	3.0
11	820-Chicago Territory	16,068	2.4	2,598	17.2	230	122	207	15,213	1,828	-0.8
12	802-Houston Territory	13,461	2.2	1,402	10.5	140	67	131	12,866	1,176	5.8
13	916-Cleveland Territory	12,872	2.1	1,851	8.2	108	200	290	12,694	950	2.2
14	890-Dallas Territory	12,582	2.0	266	2.3	31	105	148	11,791	259	6.5
15	960-Miami Territory	12,204	2.0	2,469	20.1	268	132	183	12,065	2,900	2.0
16	983-Seattle Territory	11,969	1.9	265	2.2	29	77	194	12,008	261	-0.2
17	826-Atlanta Territory	11,946	1.9	1,322	11.1	140	69	83	11,642	1,640	3.5
18	908-Pittsburgh Territory	11,881	1.8	2,352	18.6	284	119	159	10,882	1,957	9.4
19	921-Grand Rapids/Wedder Territory	11,230	1.8	2,167	18.3	257	108	133	10,483	1,848	7.3
20	900-Scranton Territory	10,781	1.7	1,277	11.8	158	123	149	10,322	1,065	4.5
21	928-Denver Territory	10,654	1.7	606	4.7	63	111	133	10,000	289	6.6
22	053-St. Louis Territory	10,501	1.7	1,095	10.4	139	100	118	9,780	925	7.7
23	915-Philadelphia Territory	10,380	1.7	778	7.5	100	175	204	10,440	876	-2.4
24	982-Milwaukee Territory	10,019	1.6	378	3.8	60	99	112	9,482	348	6.8
25	822-Detroit Territory	9,877	1.6	815	8.3	110	77	89	9,280	776	6.4
26	923-Buffalo Territory	8,580	1.5	1,085	11.3	151	89	107	9,937	1,040	-3.5
27	914-Portland Territory	8,516	1.5	214	2.2	30	78	64	8,956	246	6.3

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Ranking of Sales Areas By Market Volume
1988 Supermarket Service Dells
Poultry Total

Rank	Sales Area	1988					1987		1987-1988			
		Market (\$000)	% Total	ASE (\$000)	Share of Area	BDL	CDL	Weighted CDL	Market (\$000)	ASE (\$000)	% Change	
											Market	ASE
28	903-Indianapolis Territory	9,087	1.5	1,984	21.9	292	119	121	8,534	1,482	6.2	33.8
29	828-Springfield/Hartford Territory	8,148	1.3	1,393	16.7	223	188	172	7,886	928	8.9	48.9
30	911-Columbus Territory	7,943	1.3	421	5.3	71	128	113	7,778	448	2.1	-6.1
31	932-Memphis Territory	7,878	1.3	213	2.7	38	84	74	7,901	208	-0.3	3.2
32	916-Maine Territory	7,876	1.2	8	0.0	1	83	72	7,394	4	3.8	-12.8
33	905-Richmond Territory	7,866	1.2	183	2.4	32	112	67	7,351	131	4.3	40.0
34	948-Cincinnati Territory	8,485	1.0	534	8.3	110	122	89	9,099	457	6.8	18.8
35	902-Fort Wayne Territory	8,673	0.9	913	16.1	218	76	49	8,107	815	11.1	12.1
36	941-Kansas City Territory	8,235	0.8	284	5.9	67	82	48	4,856	213	7.8	23.9
37	881-Jacksonville Territory	4,531	0.7	620	13.7	182	66	34	4,125	1,105	9.8	-43.9
38	938-Albany Territory	4,508	0.7	8	0.0	0	187	95	4,308	0	4.8	0.0
39	807-Birmingham Territory	3,896	0.6	26	0.7	10	69	28	4,492	293	-18.8	-93.5
40	825-Toledo Territory	3,464	0.6	305	6.8	117	61	24	3,483	238	0.0	27.3
41	826-Omaha Territory	3,021	0.6	67	2.2	30	49	18	2,718	28	11.1	141.2
42	937-South Bend Territory	2,848	0.5	415	14.8	194	95	30	2,800	483	1.7	-14.0
43	833-Raleigh Territory	2,730	0.4	180	6.8	88	93	19	2,183	109	28.8	65.1
44	828-Rochester Territory	2,088	0.3	160	7.7	103	85	22	2,000	179	3.4	-18.9
45	934-Huntington Territory	1,672	0.3	147	9.4	125	84	15	1,730	131	-8.1	12.1
46	813026-Bristol/Knoxville Territory	1,842	0.2	79	5.9	78	59	9	1,260	84	6.5	-8.1
47	934-Charleston Territory	886	0.1	152	17.0	227	85	6	787	156	12.3	-2.1
48	812-Mobile/Pensacola Territory	78	0.0	11	14.3	181	19	0	68	14	11.8	-22.8
	U.S. TOTAL	822,163		46,948	7.5				600,841	48,164	3.8	1.1

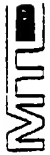
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DEL-SCAN™

Ranking of Sales Areas By Market Volume 1998 Supermarket Service Delis Turkey Breast Total

Rank	Sales Area	1998				1997				1997-1998	
		Market (\$000)	% Total	ASE (\$000)	Share of Area	BOL	COL	Weighted COL	Market (\$000)	ASE (\$000)	% Change Market ASE
1	913-New York Territory	38,362	7.3	697	2.3	29	109	558	39,919	1,874	-3.7
2	974-Boston Territory	38,261	7.3	80	0.2	3	189	965	34,854	232	8.7
3	977-Baltimore/Washington Territory	27,928	5.3	1,060	3.9	48	141	535	26,856	866	4.0
4	919-Los Angeles Territory	22,078	4.2	2,135	9.7	120	67	197	20,799	2,404	8.1
5	928-San Francisco Territory	19,647	3.7	2,931	14.9	185	95	249	18,287	3,189	2.0
6	808-Charlotte Territory	17,611	3.4	3,368	18.8	232	61	143	16,577	2,906	6.2
7	959-Tampa Territory	16,445	2.9	1,859	12.0	149	104	214	14,868	2,856	4.0
8	957-Minneapolis Territory	14,984	2.8	179	1.2	16	124	248	14,498	121	3.4
9	930-Phoenix Territory	14,982	2.8	52	0.3	4	105	210	14,438	111	3.9
10	968-San Antonio Territory	14,246	2.7	1,491	10.3	127	133	253	13,276	1,089	7.3
11	920-Chicago Territory	13,067	2.5	2,360	18.8	223	125	218	12,031	1,559	0.3
12	802-Houston Territory	11,185	2.1	1,324	11.9	147	88	128	10,438	1,097	6.9
13	990-Dallas Territory	10,784	2.1	283	2.8	32	107	164	10,019	245	7.9
14	826-Atlanta Territory	10,760	2.1	1,101	11.1	137	74	108	10,345	1,493	4.0
15	918-Cleveland Territory	10,316	2.0	994	9.8	119	180	261	10,068	882	2.2
16	883-Seattle Territory	10,229	1.9	161	1.6	19	78	108	10,143	154	0.8
17	900-Miami Territory	9,938	1.9	2,396	22.5	282	127	168	9,671	2,749	3.8
18	908-Pittsburgh Territory	9,902	1.9	2,228	22.5	279	118	156	8,884	1,721	11.5
19	921-Grand Rapids/Meer Territory	9,406	1.8	1,833	19.5	241	104	131	8,741	1,541	7.5
20	928-Denver Territory	9,171	1.7	448	4.9	60	113	138	8,580	248	6.9
21	982-Milwaukee Territory	8,790	1.7	313	3.8	44	103	121	8,173	298	7.5
22	815-Philadelphia Territory	8,740	1.7	704	8.0	100	176	204	8,061	768	-1.4
23	900-Scranton Territory	8,694	1.7	1,224	14.1	174	116	137	8,341	1,028	4.2
24	923-Buffalo Territory	8,360	1.6	1,093	12.8	148	102	114	8,431	958	-0.8
25	053-St. Louis Territory	8,078	1.5	877	12.1	150	91	98	7,348	811	9.9
26	814-Portland Territory	7,841	1.5	146	1.8	23	77	82	7,379	152	7.5
27	903-Indianapolis Territory	7,839	1.5	1,761	22.3	278	122	128	7,318	1,416	7.1

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Ranking of Sales Areas By Market Volume 1998 Supermarket Service Dells Turkey Breast Total

Rank	Sales Area	1998				1997				1997-1998		
		Market (\$000)	% Total	ASE (\$000)	Share of Area	BDL	CDL	Weighted CDL	Market (\$000)	ASE (\$000)	Market % Change	ASE
28	822-Detroit Territory	7,784	1.5	738	8.5	117	72	76	7,228	688	7.4	7.3
29	932-Memphis Territory	7,453	1.4	213	2.8	38	94	93	7,440	206	0.2	3.3
30	828-Springfield/Hartford Territory	8,634	1.3	1,229	18.8	230	181	160	8,075	819	9.0	58.1
31	811-Columbus Territory	8,235	1.2	405	8.4	79	119	101	8,039	418	4.0	-2.9
32	808-Richmond Territory	8,033	1.2	180	3.0	37	105	85	6,800	124	4.8	45.6
33	818-Maine Territory	6,861	1.1	8	0.1	1	73	55	5,470	4	3.5	-13.6
34	802-Fort Wayne Territory	6,328	1.0	888	10.3	202	84	60	4,784	772	11.4	12.6
35	948-Cincinnati Territory	4,853	0.9	319	10.5	130	111	73	4,810	442	7.4	17.5
36	941-Kansas City Territory	4,874	0.9	243	5.8	62	91	58	4,516	196	7.9	24.0
37	838-Albany Territory	3,918	0.7	0	0.8	0	183	101	3,703	0	6.8	0.0
38	881-Jacksonville Territory	3,798	0.7	531	14.0	173	88	33	3,443	878	10.3	-45.7
39	826-Toledo Territory	2,943	0.6	260	8.8	109	62	24	2,935	202	0.3	28.1
40	807-Birmingham Territory	2,821	0.6	28	0.9	11	64	24	2,519	393	-19.5	-93.5
41	925-Orlando Territory	2,787	0.5	61	2.2	27	52	18	2,487	25	11.3	148.5
42	839-Raleigh Territory	2,412	0.5	187	6.9	88	68	21	1,888	104	27.2	80.5
43	937-South Bend Territory	2,378	0.5	387	18.4	191	94	30	2,340	420	1.6	-12.5
44	836-Roanoke Territory	1,844	0.4	189	8.8	107	101	25	1,783	179	3.4	-10.9
45	934-Huntington Territory	1,248	0.2	132	10.6	131	78	19	1,374	118	-8.2	11.4
46	813/828-Bristol/Knoxville Territory	1,181	0.2	77	6.5	81	62	19	1,110	80	6.4	-3.4
47	834-Charleston Territory	816	0.2	162	16.7	231	60	7	721	165	13.0	-1.8
48	812-Mobile/Pennacota Territory	78	0.0	11	14.1	174	22	0	68	14	11.8	-23.0
	U.S. TOTAL	624,583		42,384	8.1				502,181	41,914	4.5	1.1

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Ranking of Sales Areas By Market Volume 1998 Supermarket Service Dells Oven Roasted/Prepared Turkey Breast

Rank	Sales Area	1998				1997				1997-1998	
		Market (#000)	% Total	ASE (#000)	Share of Area	BID	CDL	Weighted CDL	Market (#000)	ASE (#000)	% Change Market ASE
1	074-Boston Territory	27,283	8.6	18	0.1	1	223	1343	25,731	25	5.9
2	013-New York Territory	21,030	6.6	797	3.8	61	99	468	22,504	1,381	-7.0
3	077-Baltimore/Washington Territory	19,346	6.1	482	2.5	41	102	603	19,002	601	4.1
4	028-San Francisco Territory	13,098	4.1	1,768	13.5	218	105	303	12,640	1,992	3.3
5	019-Los Angeles Territory	19,491	3.2	1,049	10.0	162	82	121	10,422	1,400	0.7
6	098-Tampa Territory	9,632	3.0	981	10.2	185	107	228	9,211	1,488	4.6
7	030-Phoenix Territory	9,247	2.8	30	0.3	5	109	225	8,667	71	5.2
8	057-Minneapolis Territory	8,365	2.7	28	0.3	8	115	213	9,095	38	3.7
9	006-Charlotte Territory	8,338	2.6	1,282	15.1	245	48	88	7,901	1,240	5.5
10	088-San Antonio Territory	7,620	2.4	290	3.9	62	116	163	6,995	256	7.5
11	006-Pittsburgh Territory	7,101	2.2	1,408	18.8	321	140	220	6,397	1,093	11.0
12	020-Chicago Territory	7,876	2.2	663	8.4	182	112	176	7,470	454	-6.3
13	003-Seattle Territory	6,688	2.1	28	0.4	7	85	128	6,882	98	-71.2
14	021-Grand Rapids/Meijer Territory	8,484	2.0	880	10.5	170	119	171	6,138	870	6.6
15	023-Buffalo Territory	6,446	2.0	386	6.0	97	131	107	6,437	350	0.2
16	082-Milwaukee Territory	6,408	2.0	102	1.8	28	124	178	5,978	114	7.2
17	028-Atlanta Territory	6,117	1.9	373	6.1	88	70	95	6,911	562	3.5
18	002-Houston Territory	6,043	1.9	498	6.7	109	77	183	5,893	348	6.1
19	003-Indianapolis Territory	5,701	1.8	882	12.1	198	147	185	5,478	518	4.1
20	018-Cleveland Territory	5,643	1.8	429	7.5	122	172	218	5,514	339	2.3
21	011-Columbus Territory	5,533	1.7	182	3.6	55	172	210	5,284	202	4.7
22	000-Dallas Territory	5,815	1.6	88	1.7	28	82	91	4,726	68	6.1
23	028-Denver Territory	6,099	1.6	104	2.1	34	102	113	4,746	19	5.5
24	008-Scranton Territory	4,776	1.5	817	17.1	277	107	113	4,582	791	4.2
25	023-Springfield/Hartford Territory	4,741	1.5	718	15.1	245	216	225	4,424	670	7.2
26	016-Maine Territory	4,678	1.6	3	0.1	1	88	162	4,582	3	3.9
27	015-Philadelphia Territory	4,438	1.4	845	12.3	199	147	144	4,565	497	-2.6

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Ranking of Sales Areas By Market Volume 1988 Supermarket Service Dells Oven Roasted/Prepared Turkey Breast

Rank	Sales Area	1988				1987				1987-1988	
		Market (0000)	% Total	ABE (0000)	Share of Area	BOL	COL	Weighted COL	Market (0000)	ABE (0000)	% Change Market ABE
28	822-Detroit Territory	4,408	1.4	409	9.3	160	88	68	4,184	378	5.8
29	980-Albany Territory	4,320	1.4	1,880	35.9	881	81	87	4,004	1,749	7.8
30	063-St. Louis Territory	4,099	1.3	189	4.9	78	77	70	2,660	192	12.0
31	948-Cincinnati Territory	3,488	1.1	290	8.3	134	130	101	3,281	257	6.6
32	902-Fort Wayne Territory	3,447	1.1	481	12.5	202	91	69	3,112	386	10.8
33	905-Richmond Territory	2,387	1.1	113	3.3	64	97	78	3,290	67	2.9
34	832-Memphis Territory	3,284	1.0	189	3.3	54	68	48	3,339	30	-2.2
35	941-Kansas City Territory	2,928	0.9	30	1.0	16	90	88	2,783	44	6.9
36	938-Albany Territory	2,881	0.9	0	0.0	0	211	121	2,442	0	6.1
37	914-Portland Territory	2,430	0.8	12	0.5	8	39	21	2,270	9	7.0
38	801-Jacksonville Territory	2,285	0.7	228	9.9	180	66	33	2,080	427	9.9
39	828-Toledo Territory	2,114	0.7	112	6.3	88	74	35	2,102	86	0.8
40	928-Osaka Territory	1,783	0.6	28	1.6	25	85	22	1,914	15	10.6
41	834-Raleigh Territory	1,543	0.5	182	8.5	138	70	24	1,182	82	30.5
42	838-Roseville Territory	1,543	0.5	53	3.4	68	146	48	1,524	76	1.2
43	837-South Bend Territory	1,183	0.4	114	9.7	158	77	20	1,170	159	1.1
44	834-Huntington Territory	1,041	0.3	33	3.2	52	110	28	1,163	37	-10.5
45	819/28-Bristol/Knoxville Territory	927	0.3	29	3.1	60	80	16	868	43	6.7
46	834-Charleston Territory	668	0.2	82	11.9	183	84	13	816	78	12.0
47	807-Birmingham Territory	284	0.1	8	3.0	48	10	1	309	143	-14.6
48	812-Mobile/Pensacola Territory	56	0.0	2	3.6	69	26	0	48	4	14.8
	U.S. TOTAL	316,686		19,565	6.2				305,352	20,897	3.7

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Ranking of Sales Areas By Market Volume 1989 Supermarket Service Dalls Poultry Total

Rank	Sales Area	1989				1990				1989-1990	
		Market (#000)	% Total	ASE (#000)	Share of Area	BDL	CDL	Weighted CDL	Market (#000)	ASE (#000)	% Change Market ASE
28	053-St. Louis Territory	9,352	1.5	1,531	16.4	208	84	98	10,501	1,980	-10.9
29	022-Memphis Territory	8,071	1.3	428	5.3	64	81	72	7,878	213	2.4
30	010-Maine Territory	8,070	1.3	4	0.0	1	83	73	7,676	3	5.1
31	011-Columbus Territory	7,961	1.2	482	5.4	67	125	109	7,943	421	0.1
32	005-Richmond Territory	7,882	1.2	520	6.8	81	119	103	7,686	183	2.8
33	048-Channahall Territory	6,749	1.1	492	7.3	89	119	88	6,455	534	4.8
34	018-Cleveland Territory	6,295	1.0	592	11.0	134	188	137	6,359	422	-0.9
35	902-Fort Wayne Territory	5,093	0.8	1,023	29.1	246	73	41	5,333	813	-4.5
36	929-Omaha Territory	4,774	0.7	137	2.9	35	64	33	4,302	129	11.0
37	001-Jacksonville Territory	4,832	0.7	484	9.8	120	68	35	4,531	628	2.2
38	941-Kansas City Territory	4,489	0.7	388	8.8	106	76	37	3,958	237	13.7
39	938-Albany Territory	4,060	0.7	46	1.9	13	189	81	4,506	8	-2.8
40	907-Birmingham Territory	3,438	0.6	258	6.8	84	67	27	3,599	28	1.1
41	025-Toledo Territory	3,401	0.5	337	9.9	121	59	22	3,390	289	8.3
42	037-South Bend Territory	3,292	0.5	612	16.5	190	88	25	3,317	547	-0.6
43	033-Raleigh Territory	2,971	0.4	141	5.3	85	59	17	2,730	160	-2.2
44	036-Rosnoke Territory	2,099	0.3	174	8.4	103	86	19	2,088	169	0.0
45	034-Huntington Territory	1,557	0.2	162	10.3	128	77	13	1,591	147	-1.6
46	013/028-Bristol/Knoxville Territory	1,451	0.2	78	8.4	86	81	10	1,342	79	8.1
47	034-Charleston Territory	1,089	0.2	179	17.7	217	89	7	695	182	12.7
48	012-Mobilo/Pensacola Territory	80	0.0	14	17.2	211	18	0	76	11	5.2
	U.S. TOTAL	639,441		52,182	8.2				822,163	46,647	2.7

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Ranking of Sales Areas By Market Volume 1998 Supermarket Service Dells Turkey Breast Total

Rank	Sales Area	1998				1999				1998-1999			
		Market (\$000)	% Total	ASE (\$000)	Share of Area	BDL	CDL	Weighted CDL	Market (\$000)	ASE (\$000)	Market	ASE	% Change
1	913-New York Territory	39,620	7.3	624	1.3	15	110	561	39,352	697	3.0	-41.5	
2	974-Boston Territory	33,646	6.2	138	0.4	5	189	722	34,987	76	-4.1	31.8	
3	977-Baltimore/Washington Territory	28,073	5.2	1,126	4.0	46	140	607	27,928	1,090	0.5	3.2	
4	919-Los Angeles Territory	25,187	4.3	2,468	10.8	121	69	287	22,076	2,135	5.9	15.1	
5	926-San Francisco Territory	20,748	3.8	2,080	10.0	114	99	285	19,847	2,831	5.8	-29.0	
6	806-Charlotte Territory	19,634	3.6	3,066	16.9	215	64	181	17,611	3,309	10.9	11.4	
7	957-Minneapolis Territory	17,487	3.2	1,126	0.4	74	121	273	15,401	179	13.4	829.9	
8	898-Tampa Territory	17,130	3.2	1,587	9.1	104	102	226	15,443	1,856	11.9	-16.8	
9	930-Phoenix Territory	16,625	2.9	116	0.7	8	193	206	14,902	62	4.2	126.6	
10	906-Pittsburgh Territory	15,689	2.9	2,801	18.6	212	144	290	15,261	2,656	2.1	1.8	
11	949-San Antonio Territory	14,738	2.7	1,589	10.8	124	130	247	14,245	1,461	3.5	9.4	
12	928-Chicago Territory	14,325	2.6	2,314	16.2	184	135	250	13,967	2,354	9.8	-1.7	
13	990-Dallas Territory	11,427	2.1	329	2.9	33	193	162	10,852	261	4.3	16.3	
14	626-Atlanta Territory	11,297	2.1	1,114	9.9	113	75	109	10,760	1,191	5.0	-9.4	
15	802-Houston Territory	11,280	2.1	1,219	10.8	123	63	125	10,958	1,324	3.0	-8.9	
16	989-Seattle Territory	10,609	1.9	109	1.0	11	79	187	10,226	161	2.7	-30.0	
17	921-Grand Rapids/Miller Territory	10,440	1.9	2,563	24.0	274	104	140	9,621	1,832	9.7	37.0	
18	828-Springfield/Hartford Territory	10,228	1.9	1,908	18.6	213	199	289	9,877	1,294	3.6	84.6	
19	826-Denver Territory	10,157	1.9	868	6.7	111	115	161	9,291	448	10.4	120.5	
20	960-Miami Territory	9,925	1.8	1,943	19.8	223	124	159	9,938	2,255	-0.1	-14.2	
21	900-Scranton Territory	9,899	1.8	1,141	12.9	147	116	132	8,694	1,224	1.7	-6.7	
22	916-Philadelphia Territory	8,798	1.6	781	8.9	101	183	208	8,740	704	0.7	11.0	
23	903-Indianapolis Territory	8,760	1.6	1,922	21.9	250	123	139	8,167	1,756	7.5	8.9	
24	862-Milwaukee Territory	8,746	1.6	484	5.3	61	100	113	8,780	313	-0.5	48.4	
25	914-Portland Territory	8,642	1.6	163	1.8	20	78	85	7,941	145	8.8	6.5	
26	923-Buffalo Territory	8,456	1.6	1,211	14.3	183	108	116	8,366	1,003	1.1	20.7	
27	932-Memphis Territory	7,586	1.4	424	6.6	64	80	88	7,453	213	1.8	99.5	

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Ranking of Sales Areas By Market Volume 1999 Supermarket Service Dells Turkey Breast Total

Rank	Sales Area	1999				1998				1998-1999	
		Market (#000)	% Total	ASE (#000)	Share of Area	B/DI	C/DI	Weighted C/DI	Market (#000)	ASE (#000)	% Change Market ASE
28	922-Detroit Territory	7,568	1.4	943	12.5	142	69	67	7,562	761	0.1
29	053-St. Louis Territory	7,501	1.3	1,284	17.3	189	87	82	8,076	944	-0.6
30	911-Columbus Territory	6,384	1.2	416	6.5	74	118	97	6,335	405	0.8
31	805-Richmond Territory	6,212	1.1	474	7.8	87	110	88	6,063	180	2.1
32	918-Maine Territory	5,978	1.1	4	0.1	1	72	58	5,881	3	8.6
33	948-Chicago Territory	5,209	1.0	484	6.7	99	108	73	4,953	519	8.2
34	918-Cleveland Territory	4,650	0.9	901	12.1	139	184	118	4,998	366	-1.0
35	902-Fort Wayne Territory	4,796	0.9	812	19.0	217	81	59	6,003	688	-4.3
36	926-Omaha Territory	4,410	0.8	125	2.5	32	70	40	2,906	120	11.2
37	941-Kansas City Territory	4,188	0.8	341	8.1	99	83	45	2,875	217	14.8
38	901-Jacksonville Territory	3,888	0.7	389	10.3	116	67	33	2,788	531	1.8
39	938-Albany Territory	3,807	0.7	0	0.0	0	193	95	3,918	0	-2.8
40	925-Toledo Territory	2,902	0.5	293	10.1	115	60	22	2,896	255	0.1
41	907-Birmingham Territory	2,831	0.5	250	8.8	101	62	23	2,821	26	0.4
42	937-South Bend Territory	2,728	0.5	470	17.2	187	98	34	2,761	355	-0.9
43	933-Raleigh Territory	2,364	0.4	131	6.5	83	82	19	2,412	167	-2.0
44	939-Rosario Territory	1,850	0.3	173	9.3	187	89	21	1,844	159	0.3
45	913820-Bristol/Knoxville Territory	1,251	0.2	77	6.0	89	63	10	1,181	77	8.5
46	924-Huntington Territory	1,251	0.2	147	11.8	134	72	12	1,287	132	-1.3
47	934-Charleston Territory	920	0.2	178	12.5	222	84	8	815	162	12.9
48	912-Mobilia/Pennacola Territory	89	0.0	14	17.0	194	22	0	78	11	5.3
	U.S. TOTAL	942,154		47,495	6.8				924,882	42,394	3.3
											12.0

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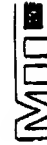
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Ranking of Sales Areas By Market Volume
1999 Supermarket Service Dells
Oven Roasted/Prepared Turkey Breast

Rank	Sales Area	1999				1998				1997-1998			
		Market (\$000)	% Total	ASE (\$000)	Share of Area	EDL	CDL	Weighted CDL	Market (\$000)	ASE (\$000)	Market	% Change	ASE
1	074-Boston Territory	21,036	7.1	39	0.2	3	192	949	25,086	19	-9.1	114.5	
2	013-New York Territory	21,028	6.6	497	2.3	34	100	464	21,030	787	2.3	-37.7	
3	077-Baltimore/Washington Territory	19,533	6.0	571	2.9	44	162	676	19,398	492	0.9	16.1	
4	026-San Francisco Territory	12,816	4.2	1,222	6.8	133	109	323	12,058	1,758	5.8	-32.5	
5	019-Los Angeles Territory	11,383	3.5	1,236	10.9	163	59	138	10,491	1,049	8.3	16.1	
6	099-Tampa Territory	10,871	3.3	862	7.8	117	107	249	9,632	981	12.9	-13.2	
7	006-Pittsburgh Territory	10,949	3.3	1,094	17.8	268	163	272	10,426	1,728	2.1	8.7	
8	057-Minneapolis Territory	10,917	3.1	593	5.8	87	115	247	8,974	26	18.6	2192.0	
9	030-Phoenix Territory	8,768	3.0	89	0.7	11	107	224	9,347	30	4.4	131.1	
10	009-Charlotte Territory	9,220	2.9	1,355	14.7	226	60	99	8,328	1,282	10.8	7.4	
11	020-Chicago Territory	7,955	2.4	628	7.9	116	124	212	7,076	661	12.8	-4.9	
12	008-San Antonio Territory	7,396	2.4	266	3.7	85	114	189	7,520	290	2.9	-1.8	
13	029-Springfield/Hartford Territory	7,317	2.2	1,160	15.7	226	232	364	6,928	718	5.6	80.2	
14	063-Seattle Territory	7,008	2.1	21	0.3	4	87	131	6,896	28	4.6	-28.8	
15	021-Grand Rapids/Miller Territory	7,008	2.1	859	12.9	204	116	174	8,560	678	8.8	40.9	
16	023-Buffalo Territory	6,849	2.0	622	8.8	120	137	192	8,448	365	1.6	36.7	
17	003-Indianapolis Territory	6,378	2.0	787	12.3	185	148	282	6,921	884	7.7	13.3	
18	062-Milwaukee Territory	6,373	2.0	198	3.1	46	121	185	8,498	102	-0.5	91.8	
19	028-Atlanta Territory	6,332	1.9	347	5.5	92	70	95	6,117	373	3.5	-7.0	
20	002-Houston Territory	6,150	1.8	397	6.6	87	77	101	5,961	406	2.5	-2.2	
21	011-Columbus Territory	5,599	1.7	238	4.2	63	172	206	5,523	192	1.2	23.0	
22	026-Denver Territory	5,499	1.7	307	5.6	64	103	121	6,021	104	9.3	196.1	
23	090-Dallas Territory	4,960	1.5	121	2.3	34	60	92	5,085	89	5.6	40.8	
24	019-Maine Territory	4,950	1.5	4	0.1	1	100	108	4,878	3	5.8	19.3	
25	008-Sacramento Territory	4,838	1.5	781	16.4	245	108	109	4,775	817	1.3	-3.2	
26	015-Philadelphia Territory	4,869	1.4	932	13.6	207	166	188	4,436	545	9.0	16.0	
27	000-Miami Territory	4,363	1.3	1,238	28.4	426	91	85	4,326	1,890	1.9	-20.1	

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Ranking of Sales Areas By Market Volume
1989 Supermarket Service Dalls
Oven Roasted/Prepared Turkey Breast

Rank	Sales Area	Market (#000)	% Total	1989		Weighted CDI	1988		1988-1989 % Change
				Market (#000)	ASE (#000)		Market (#000)	ASE (#000)	
28	822-Detroit Territory	4,288	1.3	637	12.8	84	4,288	414	0.8
29	083-St. Louis Territory	3,703	1.1	486	11.8	73	4,098	184	-8.7
30	948-Chadwell Territory	3,896	1.1	285	6.8	103	3,408	298	6.7
31	808-Richmond Territory	3,568	1.0	197	9.8	89	3,387	113	-0.5
32	922-Memphis Territory	3,387	1.0	114	3.4	63	3,284	109	2.8
33	902-Fort Wayne Territory	3,069	0.9	488	14.9	87	3,227	431	-4.8
34	929-Omaha Territory	2,957	0.8	85	2.3	75	2,858	51	11.7
35	914-Portland Territory	2,572	0.8	13	0.5	8	2,430	12	8.8
36	935-Albany Territory	2,446	0.8	6	0.0	8	2,591	8	-1.8
37	841-Kansas City Territory	2,418	0.7	48	2.0	83	2,181	22	12.6
38	916-Cleveland Territory	2,328	0.7	285	12.2	144	2,337	108	-0.3
39	801-Jacksonville Territory	2,328	0.7	149	6.4	67	2,285	228	1.7
40	826-Toledo Territory	2,088	0.6	124	6.6	71	2,083	109	-1.3
41	828-Rossmore Territory	1,848	0.5	84	4.1	82	1,843	53	0.3
42	939-Raleigh Territory	1,824	0.5	83	8.1	68	1,849	132	-1.2
43	837-South Bend Territory	1,487	0.4	248	18.9	86	1,460	111	0.5
44	934-Huntington Territory	1,042	0.3	51	4.9	73	1,057	33	-1.4
45	81828-Bristol/Knoxville Territory	1,014	0.3	32	3.2	47	927	29	8.4
46	834-Charleston Territory	781	0.2	114	14.8	80	888	82	13.4
47	807-Birmingham Territory	269	0.1	41	15.8	9	284	8	-1.9
48	812-Mobile/Pensacola Territory	68	0.0	4	8.4	27	55	2	85.2
	U.S. TOTAL	228,823	8.8	21,781	8.7	27	316,885	19,561	3.1

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DELI-SCAN™

Ranking of Sales Areas By Market Volume
2000 Supermarket Service Dells
Oven/Browned Turkey Breasts

Rank	Sales Area	2000				1999				1999-2000	
		Market (#000)	% Total	ASE (#000)	Share of Area	BID	CID	Weighted CID	Market (#000)	ASE (#000)	% Change Market ASE
1	Midwestern Region	62,477	16.7	5,961	9.5	147	103	154	61,912	6,947	0.9
2	Pennsylvania/Maryland/Virginia Region	52,088	14.1	5,082	9.8	147	160	191	50,811	4,356	4.3
3	Southeast Region	61,441	13.7	4,812	9.4	144	75	83	47,917	4,069	7.4
4	New York/New Jersey Region	43,484	11.5	1,977	3.8	89	131	137	42,711	1,082	2.3
5	North Central Region	38,669	10.3	1,318	2.4	53	109	101	38,412	1,268	8.9
6	Southwestern Region	35,078	9.2	2,322	6.1	94	78	71	37,375	2,848	1.9
7	New England Region	37,015	9.9	1,257	3.4	82	168	159	36,802	1,197	-3.4
8	South Central Region	35,426	9.4	1,888	5.3	82	74	63	32,880	1,720	7.7
9	Northwestern Region	15,243	4.1	50	0.3	5	73	27	14,854	34	3.4
	U.S. TOTAL	375,018		24,348	9.5				363,173	23,948	3.3
											1.7

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